

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

THE ESTATE OF ROBERT SHERVYN SAVIN,
and BARBARA L. SAVIN, in her capacity as
Personal Representative of the Estate of Robert
Shervyn Savin,

Defendants.

Adv. Pro No. 10-04889 (SMB)

**NOTICE OF MOTION FOR MANDATORY WITHDRAWAL OF THE REFERENCE
AND TO DISMISS FOR LACK OF SUBJECT-MATTER JURISDICTION**

**TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE that Defendant The Estate of Robert Shervyn Savin, and Barbara L. Savin, in her capacity as Personal Representative of the Estate of Robert Shervyn Savin, by their undersigned counsel, respectfully moves the United States District Court for the Southern District of New York at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal

Rules of Bankruptcy Procedure, Rule 5011-1 of the Local Rules and 28 U.S.C. § 1746 for the Southern District of New York, for an Order withdrawing the reference of the above-captioned adversary proceeding from the United States Bankruptcy Court for the Southern District of New York and dismissing this case for lack of subject-matter jurisdiction for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendant respectfully requests that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 3, 2020

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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*Attorneys for Defendant The Estate of Robert
Shervyn Savin & Barbara L. Savin in her
capacity as personal representative of the
Estate of Robert Shervyn Savin*